

### REMARKS/ARGUMENTS

Applicants have carefully reviewed the Application in light of the final Office Action mailed on September 30, 2008. Applicants respectfully request reconsideration of the present application.

#### CLAIM REJECTIONS - 35 U.S.C. § 102

Claims 48-49, 54-55, and 57-58 stand rejected under 35 U.S.C. 102 as allegedly being anticipated by Rao (US Pub. 2004/0264395; hereinafter “Rao”). These rejections are respectfully traversed.

With respect to independent claim 48, Rao does not disclose the limitation of “providing configuration information from the remote device based on the hardware profile.”

The outstanding office action alleges that Rao, in paragraph [0048], discloses this limitation (see outstanding office action, page 1, section 1, first paragraph). Specifically, Rao discloses that configured computing device 1 monitors local network 5 for a configuration announcement message from the wireless network client 2 indicating that *it has detected the predetermined broadcast message...* (see Rao, paragraph [0048], lines 2-4). The outstanding office action alleges that because Rao’s configuration announcement message from the wireless network client 2 is a *device discovery announcement* in accordance with a device discovery protocol, the message inherently carries the MAC address of the wireless network client 2 and thus has the hardware profile of the wireless network client 2 (see outstanding office action, page 28, first paragraph).

Here, Rao’s wireless network client 2 is the unconfigured device (see Rao, paragraph [0032]) to be configured and thus, is allegedly equivalent to the network device of the present application. Rao’s predetermined message broadcast by configured computing device 1 is used by the wireless network client 2 to configure itself and thus, is allegedly equivalent to the configuration information of the present application (see outstanding office action, page 3, lines 5-6, equating Rao’s predetermined message to the configuration message of the present application).

Thus, with Rao, *the predetermined message* exists and is broadcast by configured computing device 1 *before* configured computing device 1 receives any *announcement message* from the wireless network client 2. As specifically described in paragraph [0048] of Rao, the

configuration announcement message from the wireless network client 2 indicates that the wireless network client 2 *has detected the predetermined broadcast message*.

In other words, configured computing device 1 *first* broadcasts the predetermined message. Then, upon receiving the predetermined message, wireless network client 2 *next* sends the configuration announcement message to configured computing device 1. Therefore, the predetermined message *cannot be based on* the configuration announcement message as *the wireless network client 2 has not yet sent the configuration announcement message to configured computing device 1 when the predetermined message is broadcast by configured computing device 1*.

In contrast, with the present application, the configuration information, which is allegedly equivalent to Rao's predetermined message, is based on the network device's hardware profile, which is allegedly equivalent to Rao's configuration announcement message. In order for the configuration information to be based on the network device's hardware profile, the network device's hardware profile necessarily exists *prior* to the configuration information being sent. Therefore, Rao does not disclose the above limitation recited in claim 48.

#### CLAIM REJECTIONS - 35 U.S.C. § 103

Claims 1-2, 4-5, 7, 24-25, 28, 34-36, and 38 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Rao in view of Philippou et al (US Pat. 6,385,648; hereinafter "Philippou") and Hershey et al. (US Pat. 5,481,539; hereinafter "Hershey"). Claims 9-12 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Rao in view of Philippou. Claims 30, 32, 41-47, and 51-53 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Rao, Philippou, and Hershey and further in view of Nomura et al. (US Pat. 6,930,984; hereinafter "Nomura"). Claims 13-23 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Rao, Philippou, and Nomura and further in view of Ylonen et al. (US Pub. 2002/0191584; hereinafter "Ylonen"). Claims 29 and 33 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Rao, Philippou, Hershey, and Nomura and further in view of Ylonen.

First, with respect to independent claims 1, 9, and 24, claim 24 has been amended to incorporate a limitation recited in claim 1. Accordingly, the above references and specifically

Philippou, either individually or in combination, do not disclose: (1) the limitation that “the configuration message is transmitted from a remote device on the first network and addressed to a destination host on the second network” as recited in claims 1 and 24; and (2) the limitation of “transmitting from a second network a configuration message to a destination host in the first network” as recited in claim 9.

In other words, the configuration message is transmitted directly *from a device on one network to a destination host on another, different network*. Unlike the above cited references and specifically Philippou, the present application enables *remote* configuration of a device across *different networks*, that is, from one network, remotely configuring a device connected to another, different network.

The outstanding office action admits that Rao does not disclose this limitation (see outstanding office action, page 3, lines 14 & 17-19 and page 16, lines 7-8) but alleges that Philippou disclose this limitation (see outstanding office action, page 4, lines 14-18 and page 17, lines 6-8). Specifically, the outstanding office action alleges that the destination host is interpreted as Philippou’s box 205.

Applicants respectfully disagree with this interpretation that the destination host of the present application and box 205 disclosed in Philippou are conceptually equivalent. According to Philippou, box 205 is the uninitialized box that is to be initialized (see Philippou, col. 5, line 8). Thus, Philippou’s box 205 is allegedly equivalent to the network device of the present application, which is initially unconfigured and is to be configured using the process described in the present application. With the present application, the network device and the destination host are *two distinct and different* devices. Consequently, Philippou’s box 205 cannot be equivalent to both the network device and the destination host of the present application at the same time.

As specifically described in paragraph [0016] of the present application, the initial configuration information for a newly installed network device 30 may include, among others, a network device identifier, an IP address for the network device, and an IP address of a destination host *to which the initial configuration message is addressed*. This clearly indicates that the network device 30 and the destination host are two different devices.

Moreover, as described in paragraph [0017], the network management system 43 (i.e., the remote device as recited in claims 1 and 24) transmits the configuration information corresponding to the network device 30 *directly to the destination host*, which is the destination

host whose IP address has been specified in the configuration information corresponding to the network device 30.

In contrast, with Philippou, the initialization message, which is allegedly equivalent to the configuration information of the present application, is *broadcast* by configuration utility 231 over network 211 (see Philippou, col. 5, lines 48-50), *which is where configuration utility 231 is connected* (see Philippou, Figure 2).

Thus, Philippou distinguishes from the present application in at least two aspects. First, the initialization message is broadcast over the network instead of being sent to a particular destination host. Second, the initialization message is broadcast over the *same* network the configuration utility 231 is on (i.e., network 211) instead of being transmitted to a different network the configuration utility is *not* on (i.e., from a *first* network the remote device is on to a *second* network the destination host is on). Consequently, Philippou does not disclose the above limitation recited in independent claims 1, 9, and 24.

Second, with respect to independent claims 34 and 36, the above references and specifically Rao, Philippou, and Hershey, either individually or in combination, do not disclose the limitation that invalid configuration messages and packets other than configuration messages *received at the first network interface is passed to the second network interface* for forwarding along the communications path.

As admitted in the outstanding office action, although Philippou's box 205 is connected to two networks, network 211 and network 205, Philippou does not disclose passing messages received at one network interface on box 205 to another network interface also on box 205 (see outstanding office action, page 12, lines 1-4). On the other hand the outstanding office action alleges that Hershey, which discloses that messages whose IDs do not match are broadcast to nearby mobile units, in combination with Rao and Philippou, disclose this limitation (see outstanding office action, page 12, paragraphs 2 & 3).

Applicants respectfully disagree. With Hershey, the device involved is a cellular telephone mobile unit (see col. 2, line 2), which is a *wireless* device. Unlike Philippou's box 205 and the network device of the present application, Hershey's mobile unit does not contain the type of network interfaces that connect the mobile unit to various networks. Indeed, the messages are broadcast to multiple mobile units, and if a message is invalid, it is *broadcast* by

the mobile unit. Thus, Hershey, by itself, distinguishes from the present application in that Hershey's message is broadcast by a mobile unit (i.e., a wireless device), *not passed from one network interface to another network interface on the same device*.

Furthermore, broadcasting messages over by a wireless device is very different from passing a message from a network interface to another network interface within the same device. Thus, Hershey's method of forwarding invalid messages are unsuitable to be applied to the type of boxes (e.g., box 205) described in Philippou. Consequently, Rao, Philippou, and Hershey, in combination, do not disclose the above limitation recited in independent claims 34 and 36.

Third, with respect to independent claim 41, the above references and specifically Rao, either individually or in combination, do not disclose the limitation of "transmitting a configuration message to the first network, wherein the configuration message is addressed to the destination host."

The outstanding office action alleges that Rao, in paragraph 33, discloses this limitation (see outstanding office action, page 20, last two lines). In paragraph [0033], Rao describes that the predetermined message, which is allegedly equivalent to the configuration message of the present application, is repeatedly broadcast. Nothing in paragraph [0033] indicates that the predetermined message is addressed to a destination host, which is different from the wireless network client 2 to be configured.

As explained above in connection with independent claims 1, 9, and 24, with the present application, the configuration message is transmitted by a device on one network to a destination host on another, different network. Neither Rao nor Philippou discloses this limitation. To further clarify this distinction, claim 41 has been amended to specifically recite that the configuration message is transmitted *from the second network to the first network*. Consequently, claim 24 distinguishes from Rao and Philippou for the same reason as explained above in connection with independent claims 1, 9, and 24.

The pending dependent directly or indirectly depend from claims 1, 9, 24, 34, 36, 41, and 48 respectively and are therefore respectfully submitted to be patentable over the above references cited in the outstanding office action for at least the reasons set forth above with respect to the independent claims. Further, these dependent claims recite additional limitations

that when considered in the context of the claimed invention further patentably distinguish the art of record.

Claim 36 has been amended to correct a typographical error.

## CONCLUSION

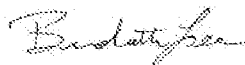
In light of the foregoing, Applicants believe that all currently pending claims are presently in condition for allowance. Applicants respectfully request a timely Notice of Allowance be issued in this case.

The Commissioner is hereby authorized to charge the Request for continued examination (RCE) fee 37 CFR §1.17(e) of \$810.00 and any fee and credit any overpayment to Deposit Account No. 02-0384 of Baker Botts LLP.

If a telephone conference would advance prosecution of this Application, the Examiner may call Bernadette Lee, Attorney for Applicant, at 650-739-7506.

Respectfully submitted,

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